

# **EXHIBIT “A”**



**Service of Process  
Transmittal**

03/18/2022

CT Log Number 541250812

**TO:** Rachel Manos  
Belfor Holdings  
185 Oakland Ave Ste 150  
Birmingham, MI 48009-3430

**RE: Process Served in Colorado**

**FOR:** Belfor USA Group, Inc. (Domestic State: CO)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: Gregg Hennix and TaWanda Hennix; H/W // To: Belfor USA Group, Inc.  
**DOCUMENT(S) SERVED:** --  
**COURT/AGENCY:** None Specified  
Case # 220301349  
**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition  
**ON WHOM PROCESS WAS SERVED:** CT Corporation System, Centennial, CO  
**DATE AND HOUR OF SERVICE:** By Certified Mail on 03/18/2022 postmarked: "Not Post Marked"  
**JURISDICTION SERVED :** Colorado  
**APPEARANCE OR ANSWER DUE:** None Specified  
**ATTORNEY(S) / SENDER(S):** None Specified  
**ACTION ITEMS:** CT will retain the current log  
Image SOP  
Email Notification, Rachel Manos Rachel.Manos@us.belfor.com  
Email Notification, Legal Help 411.legalhelpdesk@us.belfor.com  
Email Notification, Jason Maltzman jason.maltzman@us.belfor.com  
Email Notification, Mary Grace Elliott marygrace.elliott@us.belfor.com

**REGISTERED AGENT ADDRESS:** CT Corporation System  
7700 E Arapahoe Road  
Suite 220  
Centennial, CO 80112  
866-331-2303  
CentralTeam1@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

LAW OFFICES

ANDREW L. MILLER  
& ASSOCIATES, P.C.

15 ST. ASAPH'S ROAD  
BALA CYNWYD, PENNSYLVANIA 19004



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US POSTAGE

FIRST-CLASS MAIL

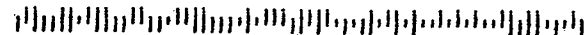
\$07.53<sup>0</sup>



ZIP 19004  
011D12802826

Belfor USA Group, Inc.  
d/b/a Belfor USA  
c/o CT Corporation System  
7700 East Arapahoe Road, Suite 220  
Centennial, CO 80112-1268

80112-126870



LAW OFFICES  
**ANDREW L. MILLER**

**&**

**ASSOCIATES**

A PROFESSIONAL CORPORATION

15 ST. ASAPH'S ROAD

BALA CYNWYD, PENNSYLVANIA 19004-2405

ANDREW L. MILLER \*  
DANIEL S. COVAL, JR.

(610) 617-1776

FAX (610) 664-9435

\* ADMITTED TO PRACTICE IN  
PENNSYLVANIA AND NEW JERSEY

E-MAIL: [AMILLER@AMILLERLAW.COM](mailto:AMILLER@AMILLERLAW.COM)

March 15, 2022

Via Certified Mail

Belfor USA Group, Inc.  
d/b/a "Belfor USA"  
c/o CT Corporation System  
7700 East Arapahoe Road  
Suite 220  
Centennial, CO 80112-1268

Re: Gregg Hennix and Tawanda Hennix; h/w vs.  
Belfor USA Group, Inc., et al.  
CCP Philadelphia County No. 220301349

Dear Sir or Madam:

Enclosed please find Plaintiffs' Complaint which was filed against you in the above matter.

Thank you.

Very truly yours,

*Andrew L. Miller*

Andrew L. Miller, Esquire

ALM:lf

Enc.

cc: Gregg and Tawanda Hennix (w/enc.) (Via Email)

Court of Common Pleas of Philadelphia County

Trial Division

**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

**MARCH 2022****001349**

E-Filing Number: 2203025187

PLAINTIFF'S NAME  
GREGG HENNIXDEFENDANT'S NAME  
BELFOR USA GROUP, INC., ALIAS: BELFOR USAPLAINTIFF'S ADDRESS  
451 HARRISON AVENUE  
GLENSIDE PA 19038DEFENDANT'S ADDRESS  
C/O CT CORPORATION SYSTEM 7700 EAST ARAPAHOE  
ROAD SUITE 220  
CENTENNIAL CO 80112-1268PLAINTIFF'S NAME  
TAWANDA HENNIXDEFENDANT'S NAME  
JOHN DOE PERSONS OR ENTITIESPLAINTIFF'S ADDRESS  
451 HARRISON AVENUE  
GLENSIDE PA 19038DEFENDANT'S ADDRESS  
UNKNOWN  
UNKNOWN PA UNKNOWN

PLAINTIFF'S NAME

DEFENDANT'S NAME

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS

TOTAL NUMBER OF PLAINTIFFS

2

TOTAL NUMBER OF DEFENDANTS

2

COMMENCEMENT OF ACTION

☒ Complaint☐ Petition Action☐ Notice of Appeal☐ Writ of Summons☐ Transfer From Other Jurisdictions

AMOUNT IN CONTROVERSY

☐ \$50,000.00 or less☒ More than \$50,000.00

COURT PROGRAMS

☐ Arbitration☒ Jury☐ Non-Jury☐ Other:☐ Mass Tort☐ Savings Action☐ Petition☐ Commerce☐ Minor Court Appeal☐ Statutory Appeals☐ Settlement☐ Minors☐ W/D/Survival

CASE TYPE AND CODE

2S - PREMISES LIABILITY, SLIP/FALL

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED  
PROPTHY****MAR 14 2022****S. RICE**IS CASE SUBJECT TO  
COORDINATION ORDER?

YES

NO

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: GREGG HENNIX , TAWANDA HENNIX

Papers may be served at the address set forth below.

NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY

ANDREW L. MILLER

ADDRESS

15 ST. ASAPH'S RD  
BALA CYNWYD PA 19004

PHONE NUMBER

(610) 617-1776

FAX NUMBER

(610) 664-9435

SUPREME COURT IDENTIFICATION NO.

55994

E-MAIL ADDRESS

amiller@amillerlaw.com

SIGNATURE OF FILING ATTORNEY OR PARTY

ANDREW MILLER

DATE SUBMITTED

Monday, March 14, 2022, 09:12 am

Court of Common Pleas of Philadelphia County

Trial Division

**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

**MARCH 2022****001349**

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SUPREME COURT IDENTIFICATION NO.

55994

E-MAIL ADDRESS

amiller@amillerlaw.com

SIGNATURE OF FILING ATTORNEY OR PARTY

ANDREW MILLER

DATE SUBMITTED

Monday, March 14, 2022, 09:12 am

Andrew L. Miller & Associates, P.C.

By: Andrew L. Miller, Esquire

Attorney I.D. #55994

15 St. Asaph's Road

Bala Cynwyd, PA 19004

(610) 617-1776

Attorney for Plaintiffs

Gregg Hennix and Tawanda Hennix, h/w

Gregg Hennix and Tawanda Hennix, h/w :

451 Harrison Avenue :

Glenside, PA 19038 :

vs. :

Belfor USA Group, Inc., :

d/b/a "Belfor USA" :

c/o CT Corporation System :

7700 East Arapahoe Road, Suite 220 :

Centennial, CO 80112-1268 :

and :

John Doe Persons or Entities :

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

JURY TRIAL DEMANDED

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Philadelphia Bar Association  
Lawyer Referral and Information Center  
One Reading Center  
Philadelphia, PA 19107  
Telephone 215-238-6333/ TTY 215-451-6197**

**NOTICIA**

Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las páginas siguientes, tiene veinte (20) días a partir de recibir esta demanda y notificación para entablar personalmente o por un abogado una comparecencia escrita y también para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO. SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO.

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One Reading Center  
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Andrew L. Miller & Associates, P.C.

By: Andrew L. Miller, Esquire

Attorney I.D. #55994

15 St. Asaph's Road

Bala Cynwyd, PA 19004

(610) 617-1776

Attorney for Plaintiffs

Gregg Hennix and Tawanda Hennix, h/w

Gregg Hennix and Tawanda Hennix, h/w :

451 Harrison Avenue :

Glenside, PA 19038 :

vs. :

Belfor USA Group, Inc., :

d/b/a "Belfor USA" :

c/o CT Corporation System :

7700 East Arapahoe Road, Suite 220 :

Centennial, CO 80112-1268 :

and :

John Doe Persons or Entities :

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

JURY TRIAL DEMANDED

### **COMPLAINT**

Plaintiffs, by their attorney, Andrew L. Miller, Esquire, bring this action against Belfor USA Group, Inc. d/b/a "Belfor USA" and John Doe Persons or Entities (hereinafter collectively referred to as "Defendants") and, in support thereof, assert the following:

### **COUNT I – NEGLIGENCE**

#### **PLAINTIFF GREGG HENNIX VS. DEFENDANTS**

1. Plaintiffs Gregg Hennix and Tawanda Hennix, husband and wife, are adult individuals who reside at the above address.

2. Defendant Belfor USA Group, Inc. d/b/a "Belfor USA" (hereinafter referred to as "Belfor") is, upon information and belief, a Colorado corporation, with a

registered agent c/o CT Corporation System, 7700 East Arapahoe Road, Suite 220, Centennial, CO 80112-1268.

3. Belfor regularly conducts business in Philadelphia County.

4. Defendant John Doe Persons or Entities are adult individuals or entities whose identities are not yet known, who are also responsible for the harm complained of herein.

5. At all times relevant hereto, the Defendant acted by its agents, servants, workmen and/or employees, and within the course and scope of their employment.

6. On August 3, 2020, Plaintiff Gregg Hennix entered into a contract with Defendant Belfor for reconstruction services, following a devastating fire, to be performed upon his home at 451 Harrison Avenue, Glenside, PA 19038.

7. On or about May 20, 2021, while the house was in the care and control of Defendant Belfor, Plaintiff Gregg Hennix was exiting his house and, while exercising due care and caution for his safety, he, suddenly and without warning, was caused to slip and fall from a temporary step which consisted of a cinderblock placed by either the staff or a subcontractor of Defendant Belfor, causing Plaintiff to sustain serious and severe personal injuries and damages.

8. Plaintiff was caused to fall by the cinderblock rolling away from the house.

9. Defendants were obligated to provide a safe means of egress from Plaintiff's house so as not to cause harm and/or injury to Plaintiff.

10. It was the duty of one or more and/or all of the Defendants to maintain the steps in front of Plaintiff's house in a safe condition for its intended use, and free from all

defects and/or conditions which one or more and/or all of the Defendants knew or should have known existed and which would render said steps dangerous and unsafe or which would create an unreasonable risk of harm to Plaintiff.

11. It was the duty of one or more and/or all of the Defendants to exercise reasonable care to protect Plaintiff from harm caused by dangerous and/or defective conditions of which one or more and/or all of the Defendants knew or should have known existed by inspection of the premises or by other affirmative acts.

12. Plaintiff Gregg Hennix' injuries were caused by the negligence and carelessness of Defendants, independently, jointly and/or severally, and/or by their agents, servants, workmen and/or employees, in that they:

- (a) failed to exercise reasonable care to protect Plaintiff of the hazard created by the temporary cinderblock step by adequately supervising and/or inspecting the step to avoid reasonably foreseeable risks of harm;
- (b) failed to provide a safe means of egress and ingress through the steps for Plaintiff;
- (c) failed to warn Plaintiff of the dangerous conditions of the temporary cinderblock step, which one or more and/or all of the Defendants knew or should have known existed;
- (d) permitted the temporary cinderblock step to remain in a dangerous and/or defective condition;
- (e) failed to personally inspect the temporary cinderblock step or to request and supervise periodic inspections of the step by their agents, servants, workmen and/or employees;
- (f) failed to correct and/or repair the dangerous and/or defective conditions, creating a reasonably foreseeable risk to Plaintiff;

- (g) failed to adequately warn Plaintiff of a dangerous and/or defective condition of which one or more and/or all of the Defendants knew or should have known existed;
- (h) failed to cordon off the unsafe and defective area;
- (i) failed to apply orange paint to warn Plaintiff of the unsafe condition;
- (j) were otherwise negligent and careless under the circumstances; and
- (k) such other actions and/or omissions by one or more and/or all of the Defendants constituting negligence which may be ascertained during the course of discovery or at the trial of this case.

13. The aforesaid acts of negligence and carelessness on the part of one or more and/or all of the Defendants was the proximate cause of the injuries sustained by Plaintiff Gregg Hennix.

14. The above-described accident and damages to Plaintiff were caused by the negligence and carelessness of Defendants, jointly and severally, and were caused in no manner whatsoever by any act or failure to act on the part of Plaintiff.

15. As a result of the Defendants' negligence, and the accident caused thereby, Plaintiff Gregg Hennix sustained serious, painful, debilitating and permanent personal injuries and damages on or about his entire body, including but not limited to, a high grade muscle rupture of the right quadriceps muscle and tendon, which required surgical repair, and caused him to endure great pain, suffering and disability.

16. Plaintiff has endured in the past, and will in the future continue to endure, great pain and suffering, as well as emotional distress and anxiety.

17. As a direct and proximate result of the above-described accident, Plaintiff sustained a diminution in his ability to enjoy life and life's pleasures and said diminution may be permanent in nature.

18. As a direct and proximate result of the above-described accident, Plaintiff has incurred charges for medical and rehabilitative care and treatment in an effort to remedy and ameliorate his injuries, and he may continue to incur said charges for an indefinite time in the future.

19. As a direct and proximate result of the above-described accident, Plaintiff was unable to attend to his usual and daily vocations and avocations, and such disabilities may to some extent be permanent.

20. As a direct and proximate result of the above-described accident, Plaintiff has sustained other forms of damage for which he is entitled to recover in this action.

WHEREFORE, Plaintiff Gregg Hennix demands judgment against all Defendants, jointly and severally, for compensatory damages in an amount in excess of Fifty Thousand (\$50,000.00) Dollars plus costs of suit and such other damages as this Court deems just.

**COUNT II – LOSS OF CONSORTIUM**

**PLAINTIFF TAWANDA HENNIX VS. ALL DEFENDANTS**

21. All of the foregoing paragraphs are restated as if set forth at length

22. Plaintiffs are husband and wife.

23. As a direct and proximate result of the negligence of Defendants as aforesaid, Plaintiff Tawanda Hennix has suffered the loss of her husband's services, care, comfort and companionship.

24. Defendants are liable to Plaintiff Tawanda Hennix for said losses.

WHEREFORE, Plaintiff Tawanda Hennix demands judgment against Defendants, jointly and severally, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, together lawful interest, costs of suit and such other and further damages this Court deems just.

Andrew L. Miller & Associates, P.C.

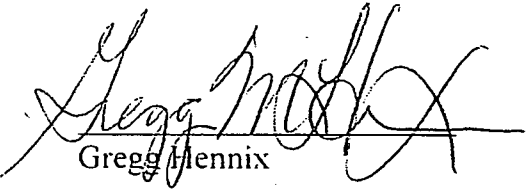
By: Andrew L. Miller  
Andrew L. Miller, Esquire  
Attorney for Plaintiffs  
Gregg Hennix and Tawanda Hennix, h/w



VERIFICATION

Gregg Hennix says that the facts and information set forth in the within Complaint are true and correct to the best of his knowledge, information and belief and that this Verification is made in accordance with the provisions of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: 3/14/22

  
Gregg Hennix

Microsoft Word document content, including text and formatting, is visible at the bottom of the page.